

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____

v. : **DATE FILED:**

PAMELA SLAUGHTER : **VIOLATIONS:**
18 U.S.C. § 1030(a)(2)(B) and (c)(2)(B)
: (unauthorized access of information from
government computer system for private
financial gain - 2 counts)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times relevant to this information:

1. Defendant PAMELA SLAUGHTER worked as a contact representative at the Internal Revenue Service (“IRS”) Philadelphia Accounts Management office in Philadelphia, Pennsylvania.

2. As part of her job, defendant PAMELA SLAUGHTER had access to the computerized IRS database known as the Integrated Data Retrieval System (“IDRS”) through which she had the ability to access confidential taxpayer records.

3. Defendant PAMELA SLAUGHTER was authorized to access the IRS computer system only to the extent that such access was necessary for her to carry out her work-related duties, and she was not authorized to use IDRS to access the records of her family and friends.

4. On or about August 3, 2001 and August 15, 2001, defendant PAMELA SLAUGHTER certified that she understood the limitations on her authorization to access the IRS computer system. She also signed IDRS security forms acknowledging the limitations on her authorization to access IDRS.

5. Defendant PAMELA SLAUGHTER discussed with “TT,” an individual known to the United States Attorney, that she intended to claim TT’s dependent child on defendant SLAUGHTER’s income tax return in order to obtain the earned income credit for that dependent.

6. On or about April 15, 2002, in the Eastern District of Pennsylvania, defendant

PAMELA SLAUGHTER

knowingly and intentionally accessed in a manner that exceeded defendant SLAUGHTER’s authority the IRS computer system and obtained information from the IRS, an agency of the United States, for purposes of private financial gain, in that defendant SLAUGHTER obtained information regarding the dependent child of another individual known to her and claimed that dependent on her 2001 income tax return in order to obtain the earned income tax credit of approximately \$1,287.

In violation of Title 18, United States Code, Section 1030(a)(2)(B) and (c)(2)(B).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 4 of Count One are re-alleged and incorporated here.
2. Defendant PAMELA SLAUGHTER discussed with “JY,” an individual known to the United States Attorney, that she intended to claim JY’s dependent child on the income tax return of defendant SLAUGHTER’s relative in order for the relative to obtain the earned income tax credit. Defendant SLAUGHTER prepared the 2002 income tax return for her relative.
3. On or about March 12, 2002, in the Eastern District of Pennsylvania, defendant

PAMELA SLAUGHTER

knowingly and intentionally accessed in a manner that exceeded defendant SLAUGHTER’s authority the IRS computer system and obtained information from the IRS, an agency of the United States, for purposes of private financial gain, in that defendant SLAUGHTER obtained information regarding the dependent child of an individual known to her and claimed that dependent on the 2002 income tax return of defendant SLAUGHTER’s relative in order for the relative to obtain the earned income tax credit of approximately \$897.

In violation of Title 18, United States Code, Section 1030(a)(B) and (c)(2)(B).

PATRICK L. MEEHAN
UNITED STATES ATTORNEY